



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
2890 WOODBRIDGE AVENUE
EDISON, NEW JERSEY 08837

JAN 27 2000

CERTIFIED MAIL # Z 403 894 953
RETURN RECEIPT REQUESTED

Mr. Paul Parchinski
Citgo Asphalt Refining Co.
4 Paradise Road
Paulsboro, NJ 74102

RE: Paulsboro Terminal (FRP #0200049)
Paulsboro, NJ

Dear Mr. Parchinski:

This letter references a Facility Response Plan (FRP) Field Inspection performed on January 11, 2000, at the Citgo Asphalt Paulsboro Terminal by Arlene Anderson. The field inspection was performed in conjunction with the regulatory review of the FRP for this facility in accordance with the requirements set forth in 40 CFR Parts 112.20 and 112.21 of the U.S. Environmental Protection Agency (EPA) regulations pertaining to oil spill response planning.

The FRP Field Inspection is conducted in order to verify the accuracy of planning information provided to EPA in a facility's FRP. The following is a listing of site-specific violations observed during the FRP Field Inspection:

The following is a listing of site-specific violations observed during the FRP Field Inspection:

1. Facility Response Equipment Inspection Logs were not maintained.
(§ 1.3.3 - Appendix F- Model Facility Specific Response Plan)
(§ 1.8.1.2 - Appendix F- Model Facility Specific Response Plan)
2. Oil Spill Removal Organization Equipment Deployment Exercise Logs were not maintained.
(§ 1.8.2 - Appendix F- Model Facility Specific Response Plan)
3. Personnel Response Training Logs were not maintained.
(§ 1.8.3.1 - Appendix F- Model Facility Specific Response Plan)
4. Discharge Prevention Meetings were not performed.
(§ 1.8.3 - Appendix F - Model Facility Specific Response Plan)
(40 CFR § 112.7(e)(10)(iii) - Personnel, Training and Spill Prevention Procedures)

5. Discharge Prevention Meeting Logs were not maintained.
(§ 1.8.3.2 - Appendix F- Model Facility Specific Response Plan)
6. Evidence of current Contracts or Other Approved Means.
(§ 112.2 - Definitions - Contract or Other Approved Means)
(§ 112.20(h)(3)(ii) - Information about Emergency Response)

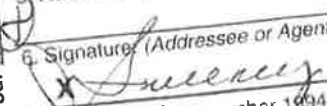
I trust you will take prompt, responsible action to eliminate any violation of 40 CFR Parts 112.20 and 112.21 by providing this office with a schedule for implementation of the necessary changes or additions to the FRP within 60 days from receipt of this letter. Please be advised that owners or operators of facilities in violation of 40 CFR Part 112 are subject to civil penalty assessments in an amount up to \$27,500.00 per day of violation.

If you have any questions concerning the FRP Field Inspection or the FRP review process in general, please contact Arlene Anderson of my staff at (732) 906-6803.

Sincerely yours,



Bruce Sprague, Chief
Response & Prevention Branch

SENDER: ■ Complete items 1 and/or 2 for additional services. ■ Complete items 3, 4a, and 4b. ■ Print your name and address on the reverse of this form so that we can return this card to you. ■ Attach this form to the front of the mailpiece, or on the back if space does not permit. ■ Write "Return Receipt Requested" on the mailpiece below the article number. ■ The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
3. Article Addressed to: Mr. Paul Parchinski Citgo Asphalt Refining Co. 4 Paradise Road Paulsboro, NJ 74102		4a. Article Number 7 403 894 953	
5. Received By: (Print Name) 6. Signature (Addressee or Agent) 		4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Express Mail <input checked="" type="checkbox"/> Return Receipt for Merchandise <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Insured <input type="checkbox"/> COD Date of Delivery 11/31/2000	
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Form 3811, December 1994